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14 UNITED STATES DISTRICT COURT
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA
16

17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 v.

20 THE STATE OF CALIFORNIA;
GAVIN C. NEWSOM, in his Official
21 Capacity as Governor of California;
KAREN ROSS, in her Official Capacity
as Secretary of the California
22 Department of Food & Agriculture;
ERIC PAN, in her Official Capacity as
Director of the California Department of
23 Public Health; and ROB BONTA, in his
Official Capacity as Attorney General of
24 California,

25 Defendants.
26

27 Case No. 2:25-cv-06230-MCS-AGR

28 **DECLARATION OF MATTHEW
DOMINGUEZ IN SUPPORT OF
PROPOSED DEFENDANT-
INTERVENORS' UNOPPOSED
MOTION TO INTERVENE**

The Honorable Mark C. Scarsi

Date: August 25, 2025

Time: 9:00 a.m.

Location: First Street Courthouse, 350
W. 1st Street, Courtroom 7C, 7th
Floor, Los Angeles, California 90012

Trial Date: None

Action Filed: July 9, 2025

1 **DECLARATION OF MATTHEW DOMINGUEZ IN SUPPORT OF**
2 **PROPOSED DEFENDANT-INTERVENORS' UNOPPOSED MOTION TO**
3 **INTERVENE**

4 I, Matthew Dominguez, declare as follows:

5 1. I am the US Director of Compassion in World Farming, Inc.
6 ("Compassion"). I have personal knowledge of the facts set forth in this decaration.
7 The facts set forth are true to the best of my knowledge and recollection. If called, I
8 could and would testify to these facts in a court of law.

9 2. Compassion has been a Defendant-Intervenor in several similar cases
10 challenging Proposition 12, including one that was eventually decided in the
11 Supreme Court. *N. Am. Meat Inst. v. Becerra*, No. 2:19-cv-08569 (C.D. Cal. Oct.
12 4, 2019); *Iowa Pork Producers Ass 'n v. Bonta*, No. 2:21-CV-09940 (C.D. Cal.
13 Dec. 16, 2021); *Nat'l Pork Producers Council v. Ross*, No. 3:19-cv-02324 (S.D.
14 Cal. Dec. 5, 2019) (lower court decision in favor of Defendants affirmed in *Nat'l*
15 *Pork Producers Council v. Ross*, 598 U.S. 356 (2023)).¹

16 3. Compassion is a nonprofit animal protection organization incorporated
17 in Delaware, with over 250,000 members and supporters, including over 10,000
18 members and supporters in California.

19 4. Compassion's mission is to end factory farming and the most
20 inhumane farming practices. This goal is to be accomplished through public
21 outreach regarding up to date relevant legislative and industry issues, through
22 corporate engagement which pressures companies to engage in higher welfare
23 farming, and by lending support to any regulatory or legislative issues that are
24 relevant to the mission.

25 5. In effort to get what ultimately became Proposition 12 on the ballot,
26 Compassion sent three employees to California to engage in the collecting of

27 ¹ In these previous cases, Compassion also used the names "Compassion in World
28 Farming USA" and "Compassion USA." These monikers all refer to the same
organization, which is formally incorporated as Compassion in World Farming, Inc.

1 signatures required for eligibility. Compassion also sent individuals to go door-to-
2 door in California to create voter awareness about the proposed ballot initiative.

3 6. In the months leading up to the vote, Compassion published numerous
4 action alerts to its supporters in California, urging them to vote in favor of
5 Proposition 12. The staff of Compassion also held several interviews and speaking
6 engagements surrounding its support of the ballot initiative that is the focus of this
7 lawsuit, and has since participated as a Defendant-Intervenor in two federal cases
8 challenging Proposition 12. Compassion also participated in the regulatory process
9 for Proposition 12 by submitting comments.

10 7. If Proposition 12 is struck down, Compassion's efforts would be
11 undermined and more of its resources would need to be expended elsewhere to
12 promote other measures to protect farm animals.

13 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the
14 foregoing is true and correct, based on my own personal knowledge, and as to those
15 matters, I believe them to be true.

17 Executed this 23rd day of July, 2025, in Brooklyn, NY.

M. Dominguez

Matthew Dominguez